



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 8-2614-00823/00001
Effective Date: 03/28/2012 Expiration Date: 03/27/2017

Permit Issued To: CARESTREAM HEALTH INC
150 VERONA ST
ROCHESTER, NY 14608

Contact: CAVAN A KELSEY
CARESTREAM HEALTH INC
150 VERONA ST
ROCHESTER, NY 14608
(585) 627-6503

Facility: CARESTREAM HEALTH AT EASTMAN BUSINESS PARK
1049 W RIDGE RD
ROCHESTER, NY 14615

Contact: SHARON M RUCINSKI
CARESTREAM HEALTH INC
1049 W RIDGE RD
ROCHESTER, NY 14615
(585) 627-8615

Description:
Renewal of the Title V Facility Permit issued April 30, 2007 and modified August 7, 2008 for the Carestream Health Inc - Health Imaging Facility, former Eastman Kodak health imaging operations in Eastman Business Park.

Changes in this Permit from the previous Permit mostly reflect revised regulations, and regulations newly applicable to facility operations, rather than significant changes in the operations themselves.

These include:

Revised building nomenclature: Building 214 is now identified as Bldg 1049 and the associated Emission Point (EP) 21401 is now EP 10491.

Updates to conditions for 6 NYCRR Part 228-1 surface coating operations;

New conditions to address 40 CFR 63 Subpart T revisions which specify a facility-wide limit on solvent emissions from metal part cleaning units;

Revisions to the list of contaminants subject to 6 NYCRR Part 212.4 control requirements based on revised coating formulations; and



New Part 212.4(a) operating conditions for the HCl scrubber for emissions from the coating machine 99 RTO control device. With the coating machine subject to 40 CFR 63 Subpart JJJJ Paper and Other Web Coating MACT requirements, testing and monitoring for control efficiency of HAP emissions from the RTO is required. Since the MACT rule does not include requirements for the scrubber, this Permit has conditions for pH and flow rate of the scrubber solution for HCl removal.

Also added is a statement that no emission sources subject to 40 CFR 64 CAM requirements have been identified. Coating machine 99 is exempt because it is subject to 40 CFR Subpart JJJJ. No other facility emission units equipped with a control device meet the 40 CFR 64.2(a)(3) applicability threshold of potential pre-control emissions at major source levels.

This Permit continues unchanged, the Part 212.10(c)(4)(iii) VOC RACT limit for pressurized vessels, a scale, and solution delivery emissions vented through EP 01413, of 0.34 tons VOC per year.

This Permit also continues unchanged, Part 212.4(a) BACT emission limits:
Total emissions of acetone, methyl acetate, and dichloromethane, from phosphor suspension solution production vented through EP 01413, remain limited to 0.25 tons per year, with dichloromethane limited to 145 pounds per year;
Total emissions of acetone and dichloromethane from solvent cleaning tanks venting through EP 01425 remain limited to 2.64 tons per year; and
Dichloromethane emissions from solution preparation vessels venting through EP 01427 remain limited to 150 pounds per year.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: SCOTT SHEELEY
NYS DEC
6274 E AVON-LIMA RD
AVON, NY 14414

Authorized Signature: _____ Date: ___ / ___ / ___



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted to the Department for approval.



Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(585) 226-2466

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: CARESTREAM HEALTH INC
150 VERONA ST
ROCHESTER, NY 14608

Facility: CARESTREAM HEALTH AT EASTMAN BUSINESS PARK
1049 W RIDGE RD
ROCHESTER, NY 14615

Authorized Activity By Standard Industrial Classification Code:
3861 - PHOTOGRAPH EQUIPMENT & SUPPLIES

Permit Effective Date: 03/28/2012

Permit Expiration Date: 03/27/2017



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.5 (a) (7): Fees
- 3 6 NYCRR 201-6.5 (c): Recordkeeping and reporting of compliance monitoring
- 4 6 NYCRR 201-6.5 (c) (2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6 NYCRR 201-6.5 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.5 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 15 6 NYCRR 201-6.5 (a) (4): Standard Requirement - Provide Information
- 16 6 NYCRR 201-6.5 (a) (8): General Condition - Right to Inspect
- 17 6 NYCRR 201-6.5 (d) (5): Standard Requirements - Progress Reports
- 18 6 NYCRR 201-6.5 (f) (6): Off Permit Changes
- 19 6 NYCRR 202-1.1: Required Emissions Tests
- 20 6 NYCRR 202-1.1: Required Emissions Tests
- 21 40 CFR Part 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6 NYCRR 200.3: False statement
- 24 6 NYCRR Subpart 201-6: Compliance Schedule for Unpermitted Sources
- 25 6 NYCRR Subpart 201-6: Emission Unit Definition
- 26 6 NYCRR 201-6.5 (f): Compliance Certification
- 27 6 NYCRR 201-6.5 (g): Non Applicable requirements
- 28 6 NYCRR Part 207: Submittal of Episode Action Plans
- 29 6 NYCRR 211.1: Air pollution prohibited
- 30 6 NYCRR 212.5 (e): Sources meeting Federal requirements, satisfy Part 212 compliance for regulated contaminant
- 31 6 NYCRR 228-1.1 (d): Will remain subject
- 32 6 NYCRR 228-1.1 (e) (13): Compliance Certification
- 33 40CFR 61, NESHAP Subpart M: National Emission Standard for Asbestos
- 34 40CFR 63.471(b)(2), Subpart T: Compliance Certification
- 35 40CFR 63.471(h), Subpart T: Compliance Certification
- 36 40CFR 63.Tbl 2, Subpart JJJJ: Subpart A Requirements for Subpart JJJJ

Emission Unit Level

- 37 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 38 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=U-00040

- 39 6 NYCRR 201-6.5 (f) (1): Compliance Certification



EU=U-00040,Proc=J02

- 40 6 NYCRR 228-1.3 (c): Solids as applied
- 41 6 NYCRR 228-1.5 (b): Use of Methods 311 or 24.
- 42 6 NYCRR 228-1.5 (c): Alternate sampling and analysis methods
- 43 6 NYCRR 228-1.5 (d): Department access to obtain samples.
- 44 6 NYCRR 228-1.5 (j): Compliance Certification
- 45 6 NYCRR 228-1.6 (a): Prohibition of sale.
- 46 6 NYCRR 228-1.6 (b): Prohibition of sale
- 47 6 NYCRR 228-1.10: Compliance Certification

EU=U-00040,Proc=J05

- 48 40CFR 63.460(b), Subpart T: Part 63 General Provisions requirements
- 49 40CFR 63.462(a)(2), Subpart T: Batch Cold Cleaning Machine Standards
- 50 40CFR 63.462(c), Subpart T: Compliance Certification
- 51 40CFR 63.471(c), Subpart T: Compliance Certification

EU=U-00040,Proc=J09

- 52 6 NYCRR Part 226: Compliance Certification

EU=U-00040,EP=01413

- 53 6 NYCRR 212.4 (c): Compliance Certification
- 54 6 NYCRR 212.6 (a): Compliance Certification
- 55 6 NYCRR 212.10 (c) (4) (iii): Compliance Certification

EU=U-00040,EP=01426,Proc=J02

- 56 6 NYCRR 228-1.4: Compliance Certification

EU=U-00040,EP=03101

- 57 6 NYCRR 228-1.4: Compliance Certification

EU=U-00040,EP=03101,Proc=J02,ES=014AD

- 58 6 NYCRR 228-1.5 (g): Compliance Certification
- 59 40CFR 63.3350(e), Subpart JJJJ: Compliance Certification
- 60 40CFR 63.3350(e), Subpart JJJJ: Compliance Certification
- 61 40CFR 63.3350(f), Subpart JJJJ: Compliance Certification
- 62 40CFR 63.3370(e), Subpart JJJJ: Compliance Certification
- 63 40CFR 63.3370(k)(2)(i), Subpart JJJJ: Compliance Certification
- 64 40CFR 63.3370(k)(3)(i), Subpart JJJJ: Compliance Certification
- 65 40CFR 63.3400(c), Subpart JJJJ: Compliance Certification
- 66 40CFR 63.3400(g), Subpart JJJJ: Compliance Certification
- 67 40CFR 63.3410, Subpart JJJJ: Compliance Certification

EU=U-00069,EP=01210

- 68 6 NYCRR 212.4 (c): Compliance Certification
- 69 6 NYCRR 212.6 (a): Compliance Certification

EU=U-00069,EP=117A0



70 6 NYCRR 212.6 (a): Compliance Certification

EU=U-00069,EP=117A0,Proc=J01,ES=117AB

71 6 NYCRR 212.4 (c): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

72 ECL 19-0301: Reporting Requirements for State-Only Enforceable Conditions

73 ECL 19-0301: Contaminant List

74 6 NYCRR 201-1.4: Unavoidable noncompliance and violations

75 6 NYCRR 211.2: Visible Emissions Limited

76 6 NYCRR 212.5 (d): Less restrictive permissible emission rate possible if BACT applied

Emission Unit Level

EU=U-00040,EP=01413

77 6 NYCRR 212.4 (a): Emissions from new emission sources and/or modifications

78 6 NYCRR 212.4 (a): Compliance Demonstration

EU=U-00040,EP=01425

79 6 NYCRR 212.4 (a): Compliance Demonstration

EU=U-00040,EP=01425,Proc=J05

80 6 NYCRR 212.4 (a): Emissions from new emission sources and/or modifications

EU=U-00040,EP=01426,Proc=J02,ES=014AU

81 6 NYCRR 212.4 (a): Emissions from new emission sources and/or modifications

EU=U-00040,EP=01427

82 6 NYCRR 212.4 (a): Compliance Demonstration

EU=U-00040,EP=01427,Proc=J08

83 6 NYCRR 212.4 (a): Emissions from new emission sources and/or modifications

EU=U-00040,EP=01428

84 6 NYCRR 212.4 (a): Emissions from new emission sources and/or modifications

EU=U-00040,EP=03101

85 6 NYCRR 212.4 (a): Compliance Demonstration

86 6 NYCRR 212.4 (a): Compliance Demonstration

87 6 NYCRR 212.4 (a): Compliance Demonstration



EU=U-00069,EP=10491

88 6 NYCRR 212.4 (a): Emissions from new emission sources and/or modifications

EU=U-00069,EP=11706

89 6 NYCRR 212.4 (a): Emissions from new emission sources and/or modifications

EU=U-00069,EP=117A0

90 6 NYCRR 212.4 (a): Emissions from new emission sources and/or modifications



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.



Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.3 (a) (4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR 201-6.3 (d) (12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR 201-6.5 (a) (2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.5 (a) (3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5 (a) (5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.5 (a) (6)

This permit does not convey any property rights of any sort or any exclusive privilege.



Item I: Severability - 6 NYCRR 201-6.5 (a) (9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR 201-6.5 (g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR 201-6.5 (i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is



three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York



The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement: 6 NYCRR 201-6.5 (c) (2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification

Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement: 6 NYCRR 201-6.5 (c) (3) (ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum



frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.
- (4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A



written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.



Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement: 6 NYCRR 201-6.5 (e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.



iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

6274 East Avon-Lima Road
Avon, NY 14414-9519

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway,

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Albany NY 12233-3251

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 9: Open Fires - Prohibitions
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 215.2

Item 9.1:

Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 9.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.



- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 11: Recycling and Salvage
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the



ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air

Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

No person shall unnecessarily remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Condition 13: Exempt Sources - Proof of Eligibility

Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 201-3.2 (a)

Item 13.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 14: Trivial Sources - Proof of Eligibility

Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 201-3.3 (a)

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 15: Standard Requirement - Provide Information

Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with

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the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 201-6.5 (d) (5)

Item 17.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Off Permit Changes
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 201-6.5 (f) (6)

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this

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submitted) one of the following, if such quantities are present:

1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 22: Recycling and Emissions Reduction
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:40CFR 82, Subpart F

Item 22.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 23: False statement
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 200.3

Item 23.1:

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

Condition 24: Compliance Schedule for Unpermitted Sources
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 24.1:

1. The owner or operator of the facility shall notify the Department within 2 working days following the identification of an unpermitted source that is required to be included in the Title V permit.

2. Within 60 working days following the identification of an unpermitted source that is required to be included in the Title V permit,

i. The owner or operator shall provide notification to the Department in accordance with the Operational Flexibility Plan under 201-6.5(f) to incorporate any such emission sources and/or emission points that meet the Operational Flexibility Plan criteria; or

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ii. The owner or operator shall submit a Title V permit modification application for unpermitted sources that do not meet the Operational Flexibility Plan criteria.

Condition 25: Emission Unit Definition
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 25.1:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00040

Emission Unit Description:

Web coating operations, including surface treatment, grid ionizers, solution delivery, and solvent cleaning operations associated with the manufacture of x-ray screens and other health imaging applications, and associated fugitive emissions.

Building(s): 014
031

Item 25.2:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00069

Emission Unit Description:

Surface coating and general process emission sources associated with Health Imaging intensifying screen manufacturing, including equipment associated with mixing, material processing, precipitation, reduction operations, product finishing/assembly, and associated fugitive emissions.

Building(s): 012
1049
117

Condition 26: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 201-6.5 (f)

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational Flexibility Plan

I. Protocol Objective



The objective of this condition is to maximize operational flexibility at the facility by building into the Title V Permit the capability to make certain changes using a protocol. As provided under 6 NYCRR Part 201-6.5(f)(2), changes made under an approved protocol are not subject to the Title V permit modification provisions under 6 NYCRR Part 201-6.7.

II. Applicability

A. The following types of changes may be reviewed under this protocol, except as prohibited under II.B or III.A.c below:

1. New emission sources,
2. 6 NYCRR Part 200 "modifications",
3. Emission point relocations, and
4. Changes that otherwise could be handled under the minor permit modification process in 6 NYCRR Part 201-6.7.

B. This protocol does not apply to the following changes:

1. Any project defined as major in 6 NYCRR 621.4(g);
2. Any significant permit modification as that term is defined in 6 NYCRR 201-6.7(d); or
3. Any change that would exceed the emissions allowable under the permit whether expressed as a rate or in terms of total emissions.

III. Protocol

A. Criteria

1. The permittee shall evaluate changes reviewed under this protocol in accordance with the following criteria:

- a. All underlying federal and state requirements with

which the new or changed emission source must comply must exist in the Title V permit. The new or changed source will be associated with an existing emissions unit, process, emission source or emission point that has the necessary regulatory citations. Existing permit conditions may be amended to reference or include the new or changed emission source and any related information, and/or, subject to DEC approval, new conditions proposed, to provide the appropriate monitoring parameters.

- b. Any new or changed emission source shall not be part



of a source project that results in a significant net emissions increase that exceeds the NSR thresholds identified in 6 NYCRR Part 231-2 or 40 CFR 52.21. The permittee will submit documentation of major NSR program non-applicability for NYSDEC review and approval consistent with the advance notification provisions of Section III.B. below.

c. The permittee shall not use the protocol to make physical changes or changes in the method of operation of existing emission sources that would require a new federally enforceable cap either to avoid major New Source Review requirements or to address and comply with other Clean Air Act requirements such as RACT. Such changes must be addressed via the significant permit modification provisions.

B. Notification Requirements for Changes Reviewed under Protocol

1. The permittee shall notify the Department in writing at least 30 calendar days in advance of making any changes reviewed under the protocol which meet the criteria of A.1. a-c, above. When the change is to a source subject to a federally applicable requirement, the EPA administrator shall be notified in a similar manner.

2. Notifications made in accordance with this protocol will include the following documentation:

- a. Identification of the Title V permit emission unit, process(es), emission sources, and emission points affected by the proposed change with applicable revisions shown in a revised Emission Unit Matrix;
- b. Description of the proposed change;
- c. If appropriate, the identification and description of emissions control technology and compliance terms;
- d. Documentation of the project's or emission source's

compliance with respect to all state and/or federally applicable requirements according to an established procedure which includes the following steps:

- i. For new emission sources, identify all contaminants and calculate the emission rate potential and maximum projected actual annual emission rates after the proposed change. For changes to existing emission sources, emission rate potential and maximum projected actual annual emission rates shall be provided for all contaminants affected by the change.



ii. Indicate the environmental rating for each contaminant identified in III.B.1.d.i as previously established by the Department or proposed based on the current DAR-1 Ambient Guideline Concentration Table or toxicological review.

iii. Provide the rationale for determining that major NSR does not apply which may include: 1) an explanation that the change is not a source project or modification under 40 CFR 52.21, 2) calculations that demonstrate that the emissions increase from the project alone is not significant or, 3) calculations that demonstrate that the net emissions increase for the contemporaneous period is not significant.

iv. Provide the necessary information for a facility-wide ambient impact analysis, including the maximum projected actual annual emission rates consistent with the permit.

v. Identify and evaluate the applicability of all regulations likely to be triggered by the new or changed emission source, using the emissions information, environmental ratings, modeling results and knowledge of operations.

e. Any other relevant information used for the evaluation of the proposed project or emission source under the Protocol.

C. Review and Approval of Changes

1. The permittee will be permitted to proceed with the change 30 days from the Department's receipt of the notification and/or additional information upon prior Departmental approval, whichever is first, unless the Department determines that a more detailed review (in accordance with #3 below) or a permit modification (in accordance with #2 below) is required.

2. The Department may require a permit modification, in order to impose new applicable requirements or additional permit conditions if it determines that changes proposed pursuant to notification do not meet the criteria under III.A or that the change may have a significant air quality impact or be otherwise potentially significant under SEQRA (6NYCRR Part 617).



3. The Department may require that the permittee not undertake the proposed change until the Department completes a more detailed review of the proposed change, which may include potential air quality impacts and/or applicable requirements. The Department's determination shall include a listing of information required for further review, if necessary.

4. The Department shall respond to the permittee in writing with a determination under #2 or 3 above within 15 days of receipt of the notification and/or additional information from the permittee.

D. Additional Compliance Obligations for Changes Made Under this Protocol

1. Upon commencement of the change, the permittee shall comply with all applicable requirements and permit conditions, including any amended or proposed in accordance with III.A.1.a above.

2. The permittee shall provide with the semi-annual monitoring report, a summary of the changes made in accordance with this protocol during the corresponding period and a statement of the compliance status of each.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 27: Non Applicable requirements
Effective between the dates of 03/28/2012 and 03/27/2017**

Applicable Federal Requirement: 6 NYCRR 201-6.5 (g)

Item 27.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

40 CFR Part 64

Reason: No emission sources have been identified that would be subject to

40 CFR 64 Compliance Assurance Monitoring (CAM) requirements for the facility. The coating machine, equipped with the RTO (EP 03101), is exempt from CAM under 40 CFR 64.2(b)(1)(i) because it is subject to the federal NESHAP (40 CFR Subpart JJJJ). There are no other emission units equipped with a control device which have potential pre-control emissions at major source levels- the



applicability criteria stated at 40 CFR 64.2(a)(3).

Condition 28: Submittal of Episode Action Plans
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR Part 207

Item 28.1:

An episode action plan must be submitted for approval by the Department in accordance with the requirements of 6NYCRR Part 207. The plan shall contain detailed steps which will be taken by the facility to reduce air contaminant emissions during each stage of an air pollution episode. Once approved, the facility shall take whatever actions are prescribed by the episode action plan when an air pollution episode is in effect.

Condition 29: Air pollution prohibited
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 211.1

Item 29.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 30: Sources meeting Federal requirements, satisfy Part 212 compliance for regulated contaminant
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 212.5 (e)

Item 30.1:

A process emission source, subject to the Federal new source performance standards in 40 CFR Part 60, the national emission standards for hazardous air pollutants in 40 CFR part 61, or to the polychlorinated biphenyl disposal criteria in 40 CFR Part 761 satisfies the requirements of this Part for the contaminant regulated by the Federal standard if the source owner can demonstrate that the source is in compliance with the respective Federal regulation.

Condition 31: Will remain subject
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 228-1.1 (d)

Item 31.1:

Any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228-1 will remain subject to these provisions even if the annual potential to emit VOCs for the facility later falls below the thresholds set forth in 228-1.1(b).



Condition 32: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 228-1.1 (e) (13)

Item 32.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Low-use specialty coatings may be used in surface coating operations pursuant to the Part 228-1 exemption of 6 NYCRR Part 228-1.1(e)(13) if approved by the Department.

6 NYCRR Part 228-1 does not apply to low-use surface coatings used for intermittent or specialty -type operations, where the combined facility-wide total usage is 55 gallons or less on a 12-month rolling basis.

Records of low-use surface coatings used must be maintained on an as used basis in a format acceptable to the Department in accordance with the record keeping provisions of 6 NYCRR Part 228-1.5.

The permittee may use the Operational Flexibility provisions included in this permit to request approval of an exempt low-use specialty coating.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 33: National Emission Standard for Asbestos
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:40CFR 61, NESHAP Subpart M

Item 33.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 61, Subpart M.

Condition 34: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017



Applicable Federal Requirement:40CFR 63.471(b)(2), Subpart T

Item 34.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000075-09-2 DICHLOROMETHANE

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must ensure that the total emissions of methylene chloride (MC) used in all solvent cleaning machines at the facility are equal or less than 60,000 kg/yr, on a rolling 12-month basis, as required by 40CFR 63.471 Table 1. Compliance with the facility-wide emission limit shall be determined using the procedures in paragraph 63.471(c).

On the first operating day of every month, the owner/operator shall determine the 12-month rolling total halogenated HAP solvent emissions for all cleaning machines at the facility, ETfacility, in kilograms /yr, in accordance with the procedures in paragraphs 63.471(c)(1) through (5).

Any exceedence of this limit shall be reported as required in 40 CFR 63.468(h).

The owner/operator shall maintain records specified in paragraphs 63.471(e)(1) through (3) for a period of 5 years.

Monitoring Frequency: MONTHLY

Averaging Method: 12-month total, rolled monthly

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 35: Compliance Certification

Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:40CFR 63.471(h), Subpart T

Item 35.1:

The Compliance Certification activity will be performed for the Facility.

Item 35.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 8-2614-00823/00001

Facility DEC ID: 8261400823



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall submit a solvent emission report every year. This solvent emission report shall contain the requirements specified in paragraphs (1) through (3).

(1) The average monthly solvent consumption for the affected facility in kilograms per month.

(2) The 12-month rolling total solvent emission estimates calculated each month using the method as described in paragraph (c).

(3) This report can be combined with the annual report required in 40CFR 63.468(f) and (g) into a single report for each facility.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

Subsequent reports are due every 12 calendar month(s).

**Condition 36: Subpart A Requirements for Subpart JJJJ
Effective between the dates of 03/28/2012 and 03/27/2017**

Applicable Federal Requirement:40CFR 63.Tbl 2, Subpart JJJJ

Item 36.1:

The applicant must comply with the requirements of 40 CFR 63 Subpart A, as specified in Table 2 of 40 CFR 63 Subpart JJJJ.

****** Emission Unit Level ******

**Condition 37: Emission Point Definition By Emission Unit
Effective between the dates of 03/28/2012 and 03/27/2017**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 37.1:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00040

Emission Point: 01413

Height (ft.): 38

Diameter (in.): 16

NYTMN (km.): 4786.274 NYTME (km.): 286.201 Building: 014

Emission Point: 01425



Height (ft.): 20 Diameter (in.): 15
NYTMN (km.): 4786.274 NYTME (km.): 286.201 Building: 014

Emission Point: 01426
Height (ft.): 31 Diameter (in.): 38
NYTMN (km.): 4786.274 NYTME (km.): 286.201 Building: 014

Emission Point: 01427
Height (ft.): 26 Diameter (in.): 2
NYTMN (km.): 4786.274 NYTME (km.): 286.201 Building: 014

Emission Point: 01428
Height (ft.): 33 Diameter (in.): 5
NYTMN (km.): 4786.274 NYTME (km.): 286.201 Building: 014

Emission Point: 03101
Height (ft.): 45 Diameter (in.): 36
NYTMN (km.): 4785. NYTME (km.): 286. Building: 031

Item 37.2:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00069

Emission Point: 01210
Height (ft.): 1 Length (in.): 56 Width (in.): 26
NYTMN (km.): 4786.274 NYTME (km.): 286.201 Building: 012

Emission Point: 10491
Height (ft.): 34 Diameter (in.): 13
NYTMN (km.): 4786.274 NYTME (km.): 286.201 Building: 1049

Emission Point: 11706
Height (ft.): 30 Length (in.): 14 Width (in.): 12
NYTMN (km.): 4786.274 NYTME (km.): 286.201 Building: 117

Emission Point: 117A0
Height (ft.): 36 Diameter (in.): 10
NYTMN (km.): 4786.274 NYTME (km.): 286.201 Building: 117

Condition 38: Process Definition By Emission Unit
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 38.1:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00040
Process: J02 Source Classification Code: 3-16-050-01
Process Description: Plastic/Paper Web Surface Coating Process.



Emission Source/Control: 014AP - Process

Emission Source/Control: 014AQ - Process

Item 38.4:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00040

Process: J05

Source Classification Code: 3-16-120-02

Process Description:

Halogenated solvent cleaning operations using solvent mixture, subject to 40 CFR 63 Subpart T

Emission Source/Control: 014AE - Process

Emission Source/Control: 014AF - Process

Emission Source/Control: 014AK - Process

Emission Source/Control: 014AL - Process

Emission Source/Control: 014AM - Process

Emission Source/Control: 014AN - Process

Emission Source/Control: 014AP - Process

Emission Source/Control: 014AQ - Process

Item 38.5:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00040

Process: J06

Source Classification Code: 3-16-050-01

Process Description: R&D Web Surface Coating

Emission Source/Control: 031AA - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 031AB - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 014AD - Process

Item 38.6:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00040

Process: J08

Source Classification Code: 3-16-160-03

Process Description:

General process emission sources with VOC emission less than 3 lb/hr ERP (i.e. solution storage, handling,

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preparation & evaporation).

Emission Source/Control: 031AA - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 031AB - Control
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 014AG - Process

Emission Source/Control: 014AT - Process

Item 38.7:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00040

Process: J09

Source Classification Code: 3-16-120-02

Process Description:

Solvent Metal Cleaning operations using a solvent mixture, subject to 6 NYCRR Part 226

Emission Source/Control: 014AE - Process

Emission Source/Control: 014AF - Process

Emission Source/Control: 014AK - Process

Emission Source/Control: 014AL - Process

Emission Source/Control: 014AM - Process

Emission Source/Control: 014AN - Process

Emission Source/Control: 014AP - Process

Emission Source/Control: 014AQ - Process

Emission Source/Control: 12226 - Process

Item 38.8:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00040

Process: J13

Source Classification Code: 3-16-160-03

Process Description:

General process emission sources with VOC emissions greater than 3 lb/hr ERP (i.e. solution storage, handling, preparation and evaporation)

Emission Source/Control: 01401 - Control
Control Type: FABRIC FILTER



Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission Unit U-00040 includes emission sources which are permitted under more than one operating scenario. Two different alternate operating scenarios; one defined by Surface Coating Processes J02 and J06, and the other defined by Solvent Cleaning Processes J04, J05 and J09. These processes share some of the same equipment, but operate the shared equipment in different ways or in a manner that triggers different applicable requirements.

Contemporaneously with making a change from one operating scenario to another, Carestream shall record the scenarios in a log in the operating area or retain appropriate time stamped operating records that indicate which scenario is in operation. Records shall be kept on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

**Condition 40: Solids as applied
Effective between the dates of 03/28/2012 and 03/27/2017**

Applicable Federal Requirement:6 NYCRR 228-1.3 (c)

Item 40.1:

This Condition applies to Emission Unit: U-00040
Process: J02

Item 40.2:

The overall removal efficiency of an air cleaning device used as a control strategy must be determined, for every surface coating formulation, on a solids as applied basis using Equation 2 unless an 85 percent or greater overall removal efficiency is achieved by the air cleaning device. The air cleaning device must be designed and operated to provide, at a minimum, an overall removal efficiency of either 85 percent or as determined by Equation 2.

$$n = \left[1 - \frac{(VOC)_c(Vn)_a}{(VOC)_a(Vn)_c} \right] \times 100\% \quad \text{Equation 2}$$

where:



n is the overall removal efficiency

(VOC)_c is the maximum permissible pounds of VOC per gallon of coating minus water and excluded VOC at application, as set forth in tables 1 and 2 of 6 NYCRR 228-1.

(VOC)_a is the VOC content of an as applied coating, expressed as pounds of VOC per gallon of coating minus water and excluded VOC

(V_n)_c is the volumetric fraction of solids, expressed as gallon of solids per gallon of coating minus water and excluded VOC, in a compliant coating expressed as:

$$(V_n)_c = 1 - (V_v)_c \quad \text{Equation 3}$$

(V_v)_c is the volumetric fraction of VOC, expressed as gallon of VOC per gallon of coating minus water and excluded VOC, in a compliant coating expressed as:

$$(V_v)_c = \frac{(VOC)_c}{d_{VOC}} \quad \text{Equation 4}$$

(V_n)_a is the volumetric fraction of solids, expressed as gallon of solids per gallon of coating minus water and excluded VOC, in an as applied coating expressed as:

$$(V_n)_a = 1 - (V_v)_a \quad \text{Equation 5}$$

(V_v)_a is the volumetric fraction of VOC, expressed as gallon of VOC per gallon of coating minus water and excluded VOC, in an as applied coating expressed as:

$$(V_v)_a = \frac{(VOC)_a}{d_{VOC}} \quad \text{Equation 6}$$

dVOC is the density of VOC as applied, i.e., total volatiles minus water and excluded VOC, in pounds of VOC per gallon of VOC

Condition 41: Use of Methods 311 or 24.
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement: 6 NYCRR 228-1.5 (b)

Item 41.1:

This Condition applies to Emission Unit: U-00040
 Process: J02

Item 41.2:

Upon request by the Department, the owner and operator of any emission source subject to 6 NYCRR Part 228-1, must use Method 311 or Method 24 as presented in Appendices A of both

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requirements of 6NYCRR Part 228-1 must be reported to the Department within 30 days following notice or generation of the information or record.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 45: Prohibition of sale.
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 228-1.6 (a)

Item 45.1:

This Condition applies to Emission Unit: U-00040
Process: J02

Item 45.2:

No person shall sell, specify, or require for use the application of a coating on a part or product at a facility with a coating line described in table 1 or 2 in section 228-1.7 or 228-1.8 of 6NYCRR Part 228-1 if such use is prohibited by any of the provisions of this Part. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at this facility. This prohibition shall not apply to the following:

- (1) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in tables 1 and 2 of sections 228-1.7 or 228-1.8 of 6NYCRR Part 228-1;
- (2) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in section 228-1.3(d) of 6NYCRR Part 228-1; and
- (3) coatings utilized at surface coating lines that have been granted variances for reasons of technological and economic feasibility per section 228-1.3(e) of 6NYCRR Part 228-1.

Condition 46: Prohibition of sale
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 228-1.6 (b)

Item 46.1:

This Condition applies to Emission Unit: U-00040
Process: J02

Item 46.2:

Any person selling a coating for use in a coating line subject to 6 NYCRR Part 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

Condition 47: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 228-1.10



Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Process: J02

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Part must:

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (g) beginning on January 1, 2005, clean spray guns used to apply mobile equipment repair and refinishing or color-matched coatings by one of the following:
 - (1) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Open containers, if found, shall be covered and such

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deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 48: Part 63 General Provisions requirements
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:40CFR 63.460(b), Subpart T

Item 48.1:

This Condition applies to Emission Unit: U-00040
Process: J05

Item 48.2:

Owners or operators of affected sources subject to 40CFR63 Subpart T must also comply with the requirements of Subpart A of Part 63, according to the applicability of Subpart A to such sources, as identified in Appendix B of Subpart T. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, recordkeeping, reporting, and control devices that may apply to the source.

Condition 49: Batch Cold Cleaning Machine Standards
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:40CFR 63.462(a)(2), Subpart T

Item 49.1:

This Condition applies to Emission Unit: U-00040
Process: J05

Item 49.2:

Each owner/operator of an immersion batch cold cleaning machine shall employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and have a freeboard ratio of 0.75 of greater.

Condition 50: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:40CFR 63.462(c), Subpart T



Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Process: J05

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of a batch cold solvent cleaning machine complying with paragraph 40 CFR 63.642 (a)(2) or (b) shall comply with the work and operational practice requirements specified in paragraphs (1) through (9) listed below:

- (1) All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- (2) If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
- (3) The owner or operator shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
- (4) The owner or operator shall ensure that the solvent level does not exceed the fill line.
- (5) Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of paragraph (c)(1) of this section.
- (6) When an air- or pump-agitated solvent bath is used, the owner or operator shall ensure that the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned.
- (7) The owner or operator shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.



(8) Except as provided in paragraph (c)(9) of this section, sponges, fabric, wood, and paper products shall not be cleaned.

(9) The prohibition in paragraph (c)(8) of this section does not apply to the cleaning of porous materials that are part of polychlorinated biphenyl (PCB) laden transformers if those transformers are handled throughout the cleaning process and disposed of in compliance with an approved PCB disposal permit issued in accordance with the Toxic Substances Control Act.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 51: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:40CFR 63.471(c), Subpart T

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Process: J05

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall on the first operating day of every month, demonstrate compliance with the applicable facility-wide emission limit on a 12-month rolling total basis using the procedures in paragraphs 40CFR 63.471(c)(1) through (5). For purposes of this paragraph, EACH SOLVENT CLEANING MACHINE means each solvent cleaning machine that is part of an affected facility regulated by this section.

(1) The owner or operator shall, on the first operating day of every month, ensure that each solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soiled materials. A fill line must be indicated during the first month the measurements are made. The solvent



level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions as specified in paragraphs (2) and (3). The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

(2) The owner or operator shall, on the first operating day of the month, using the records of all solvent additions and deletions for the previous month, determine solvent emissions (Eunit) from each solvent cleaning machine using equation 10 in 40CFR 63.471

(3) The owner or operator shall, on the first operating day of the month, determine SSRI using the method specified in paragraph (i) or (ii).

(i) From tests conducted using EPA reference method 25d.

(ii) By engineering calculations included in the compliance report.

(4) The owner or operator shall on the first operating day of the month, after 12 months of emissions data are available, determine the 12-month rolling total emissions, ETunit, for the 12-month period ending with the most recent month using equation 11 in 40CFR 63.471

(5) The owner or operator shall on the first operating day of the month, after 12 months of emissions data are available, determine the 12-month rolling total emissions, ETfacility, for the 12-month period ending with the most recent month using equation 12 in 40CFR 63.471

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 52: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement: 6 NYCRR Part 226

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Process: J09



(5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.

(6) Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.

(7) If using a cold cleaning degreaser that is subject to paragraph 226.3(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this requirement.

(a) the name and address of the solvent supplier;

(b) the type of solvent including the product or vendor identification number; and

(c) the vapor pressure of the solvent measured in mm Hg at 20 °C (68 F).

D. Record Keeping Requirements:

Deviations from these requirements shall be recorded in a log maintained for this purpose within the corresponding operating area and shall be appropriately identified in the semi-annual monitoring report. In addition, the log must note whether the cold cleaner is equipped with an internal drain as specified in item A(2) above.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 53: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 53.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 01413

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 53.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



In order to demonstrate compliance with the 0.050 grains/sdcf particulate standard of Part 212.4(c), the primary set of panel filters (Control Device 01401) and the backup set of HEPA filters (Control Device 01402) will be inspected semi-annually and replaced if necessary. Records of filter changes shall be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 54: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 54.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 01413

Item 54.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated

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with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 55: Compliance Certification

Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (4) (iii)

Item 55.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 01413

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 55.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 212 Reasonably Available Control Technology (RACT) requirements for the Pressurized Vessels and Weigh Scale (ES 014AJ) and Solution Delivery (ES 014AH), annual emissions of total VOCs from this emission point are limited to 0.34 tons per year, on a rolling twelve-month basis. This limit is based on the most recent RACT evaluation, dated May 2008.

Emissions shall be calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. These



records shall be retained on site for five years and made available to the Department upon request.

The RACT determination shall be re-evaluated and submitted to the Department every five years. The next such evaluation is due May 31, 2013.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 56: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 228-1.4

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040 Emission Point: 01426
Process: J02

Item 56.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated



with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the Method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up Method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 57: Compliance Certification

Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 228-1.4

Item 57.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 03101

Item 57.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any



necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the Method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up Method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 58: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement: 6 NYCRR 228-1.5 (g)

Item 58.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00040 Emission Point: 03101
Process: J02 Emission Source: 014AD

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 58.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to maintain compliance with 6NYCRR Part 228-1 Surface Coating VOC RACT requirements, Carestream shall operate the Regenerative Thermal Oxidizer (RTO)(Control Device 031AA) to achieve at least 85% removal efficiency. Continuous monitors of the combustion/retention chamber temperature of the RTO shall be installed, periodically calibrated, and operated at all times that the RTO is



(3) Facility must determine the hourly average of all recorded readings according to paragraphs (3)(i) and (ii) below.

(i) To calculate a valid hourly value, there must be at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.

(ii) Provided all of the readings recorded in accordance with paragraph (3) clearly demonstrate continuous compliance with the standard that applies to the facility, then the facility is not required to determine the hourly average of all recorded readings.

(4) Facility must determine the rolling 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, at all times the surface coating machines are operating, there must be at least two of three of the hourly averages for that period using only average values that are based on valid data (i.e., not from out-of-control periods).

(5) Facility must record the results of each inspection, calibration, and validation check of the CPMS.

(6) At all times, facility must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(7) Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), facility must conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in § 63.3370. Facility must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(8) Any averaging period for which there is no valid monitoring data and such data are required constitutes a deviation, and the facility must notify the Administrator in accordance with § 63.3400(c).

Monitoring Frequency: CONTINUOUS
Averaging Method: AVERAGING METHOD - SEE MONITORING
DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.
The initial report is due 7/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 60: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:40CFR 63.3350(e), Subpart JJJJ

Item 60.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040 Emission Point: 03101
Process: J02 Emission Source: 014AD

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 60.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to comply with the emission standard in §63.3320(b)(1) for 95% reduction of HAPs through the use of a capture system and control device for the surface coating operations (ES 014AD), the facility must maintain a minimum combustion zone temperature of 1621 degrees F (3-hour block average) at all times the surface coating machines are operating, as demonstrated during the December 8, 2008 performance test.

In accordance with §63.3350(e)(9), a facility using a non-catalytic oxidizer to comply must install, calibrate, maintain and operate a continuous temperature monitoring system according to the manufacturer's specifications and the requirements of §63.3350(e)(1)-(8). The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart records, data logger, or temperature indicator must be replaced. The facility must replace the equipment whether the facility chooses not to perform the calibration or the equipment cannot be calibrated properly.

The temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of +/-1% of the temperature being monitored in degrees Celsius, or +/-1 degree Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.

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Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1621 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 61: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:40CFR 63.3350(f), Subpart JJJJ

Item 61.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040 Emission Point: 03101
Process: J02 Emission Source: 014AD

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 61.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to comply with the emission standard in §63.3320(b)(1) for 95% reduction of HAPs through the use of a capture system and control device for the surface coating operations (ES 014AD), the facility must develop a site-specific monitoring plan for these capture systems. The plan must be maintained on site and made available to the Department upon request.

The monitoring plan must:

- 1) identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained;
- 2) explain why this parameter is appropriate for demonstrating ongoing compliance, and
- 3) identify the specific monitoring procedures.

The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in §63.3320. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.

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The facility must monitor the capture system in accordance with the site-specific monitoring plan.

Any deviation from the operating parameter value or range of values will be considered a deviation from the emission limit.

The facility must review and update the capture system monitoring plan at least annually.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 62: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:40CFR 63.3370(e), Subpart JJJJ

Item 62.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040

Emission Point: 03101

Process: J02

Emission Source: 014AD

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 62.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility must operate a capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95% for each month. In order to assume 100 percent capture efficiency, the facility must operate such that the Permanent Total Enclosure (PTE) around the coating machine (ES 014AD) is maintained as demonstrated during the December 8, 2008 performance test in accordance with the specifications of §63.3360(f). The facility will monitor the PTE exhaust air volumetric flow rates and supply air flow rates to ensure that the difference between the PTE exhaust air flow and supply air flow rates is equal to or greater than 160 acfm at all times the surface coating machines are operating. Air flow across all the natural draft openings of the PTE will be monitored continuously as specified in the site

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specific monitoring plan written and updated in accordance with §63.3350(f).

Parameter Monitored: AIR FLOW
Lower Permit Limit: 160 cubic feet per minute
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 63: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:40CFR 63.3370(k)(2)(i), Subpart JJJJ

Item 63.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00040 Emission Point: 03101
Process: J02 Emission Source: 014AD

Item 63.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:
Calculate the overall organic HAP control efficiency achieved using the following equation:

R = (E)(CE) / 100

Where:

R = Overall organic HAP control efficiency, percent.
E = Organic volatile matter control efficiency of the control device, percent.
CE = Organic volatile matter capture efficiency of the capture system, percent.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 64: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017



Applicable Federal Requirement:40CFR 63.3370(k)(3)(i), Subpart JJJJ

Item 64.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040 Emission Point: 03101
Process: J02 Emission Source: 014AD

Item 64.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is in compliance with the emission standards in § 63.3320(b) if the oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in accordance with § 63.3360(e) for each 3-hour period, and the capture system operating parameter is operated at an average value greater than or less than (as appropriate) the operating parameter value established in accordance with § 63.3350(f); and

(i) The overall organic HAP control efficiency is 95 percent or greater at an existing affected source.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 65: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:40CFR 63.3400(c), Subpart JJJJ

Item 65.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040 Emission Point: 03101
Process: J02 Emission Source: 014AD

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 65.2:

Compliance Certification shall include the following monitoring:



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a semiannual compliance report according to the following schedule:

The first compliance report must cover the period beginning on the compliance date that is specified for the affected source in §63.3330 and ending on June 30 or December 31, whichever date is the first date following the end of the calendar half immediately following the compliance date. The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the calendar half immediately following the compliance date.

Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual period from July 1 to December 31. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

The semiannual compliance report shall contain the following information:

- company name and address
- statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report
- date of report and beginning and ending dates of the reporting period
- if there were no deviations from any emission limitations (emission limit or operating limit) that apply to the facility, a statement that there were no deviations from the emission limitations during the reporting period, and that no continuous monitoring system was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
- for each deviation from an emission limitation (emission limit or operating limit) that applied to the facility and that occurs at an affected source where the facility is not using a continuous emission monitoring system to comply with the emission limitations, the compliance report must contain the total operating time of each affected source during the reporting period, information on the number, duration, and cause of deviations (including known causes), if applicable, and the corrective action taken, information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.



- for each deviation from an emission limit occurring at an affected source where a CEMS is used, the information in §63.3370(c)(2)(vi)(A)-(J) shall be submitted.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 66: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:40CFR 63.3400(g), Subpart JJJJ

Item 66.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040 Emission Point: 03101
Process: J02 Emission Source: 014AD

Regulated Contaminant(s):
CAS No: ONY100-00-0 HAP

Item 66.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit startup, shutdown, and malfunction reports as specified in §63.10(d)(5), except that the provisions in subpart A of this part pertaining to startups, shutdowns, and malfunctions do not apply unless a control device is used to comply with this subpart.

(1) If actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not consistent with the procedures specified in the affected source's SSMP required by §63.6(e)(3), the owner or operator must state such information in the report. The startup, shutdown, or malfunction report must consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy and must be submitted to the Administrator.

(2) Separate startup, shutdown, and malfunction reports are not required if the information is included in the report specified in paragraph (c)(2)(vi) of this section.



Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 67: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement: 40CFR 63.3410, Subpart JJJJ

Item 67.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00040 Emission Point: 03101
Process: J02 Emission Source: 014AD

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 67.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator of an affected source must maintain the following records on a monthly basis for at least five years after each occurrence that requires recordkeeping. The latest two years must be kept on site and readily available, and the remaining 3 years may be kept off-site or on computer or other means as specified in §63.10(b)(1):

- The records specified in §63.10(b)(2) of all measurements needed to demonstrate compliance with Subpart JJJJ, including continuous emission monitor data in accordance with §63.3350(d)
- control device and capture system operating parameter data in accordance with §63.3350(c),(e), and (f)
- organic HAP content data for the purpose of demonstrating compliance in accordance with §63.3360(c)
- volatile matter and coating solids content data for the purpose of demonstrating compliance with §63.3360(d)
- overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with §63.3360(e) and (f)
- material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with §63.3370(b), (c), and (d)
- records specified in §63.10(c) for each continuous monitoring system operated by the owner/operator in accordance with §63.3350(b)
- records of all liquid-liquid material balances performed in accordance with §63.3370.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 68: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 68.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069

Emission Point: 01210

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 68.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with the 0.050 grains/dscf particulate standard of Part 212.4(c), the primary set of panel filters (Control Device 01201) and the backup set of panel filters (Control Device 01202) will be inspected during the two shutdown periods at the facility (within the two week period surrounding the July 4th holiday and within the two week period surrounding the December 25th holiday) and replaced as necessary. Records of filter changes shall be retained on site for five years and made available to the Department upon request.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 69: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 69.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069

Emission Point: 01210



Item 69.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 70: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement:6 NYCRR 212.6 (a)

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Item 70.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069

Emission Point: 117A0

Item 70.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).



Condition 71: Compliance Certification
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 71.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00069
Process: J01

Emission Point: 117A0
Emission Source: 117AB

Item 71.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to

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the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 72: Reporting Requirements for State-Only Enforceable Conditions
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable State Requirement:ECL 19-0301

Item 72.1:

Notwithstanding the reporting requirements found at Condition #5 of this Permit, for those state only enforceable conditions with a reporting requirement of "Upon request by regulatory agency", the permittee is not obligated to include a statement regarding monitoring, record keeping, or deviations in the semi-annual report. Nothing contained in this paragraph shall impair or prejudice any rights the Department may have to seek information from the permittee



regarding compliance with the State-Only enforceable conditions.

Condition 73: Contaminant List

Effective between the dates of 03/28/2012 and 03/27/2017

Applicable State Requirement:ECL 19-0301

Item 73.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000064-17-5
Name: ETHYL ALCOHOL (ETHANOL)

CAS No: 000067-64-1
Name: DIMETHYL KETONE

CAS No: 000071-23-8
Name: PROPANOL

CAS No: 000071-55-6
Name: ETHANE, 1,1,1-TRICHLORO

CAS No: 000075-09-2
Name: DICHLOROMETHANE

CAS No: 000079-20-9
Name: ACETIC ACID, METHYL ESTER

CAS No: 000108-88-3
Name: TOLUENE

CAS No: 000109-99-9
Name: TETRAHYDROFURAN

CAS No: 000110-82-7
Name: CYCLOHEXANE

CAS No: 000141-78-6
Name: ETHYL ACETATE

CAS No: 007647-01-0
Name: HYDROGEN CHLORIDE

CAS No: 0NY075-00-0
Name: PARTICULATES

CAS No: 0NY100-00-0
Name: HAP

CAS No: 0NY998-00-0
Name: VOC



Condition 74: Unavoidable noncompliance and violations
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable State Requirement:6 NYCRR 201-1.4

Item 74.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific

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federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 75: Visible Emissions Limited
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable State Requirement:6 NYCRR 211.2

Item 75.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 76: Less restrictive permissible emission rate possible if BACT applied
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable State Requirement:6 NYCRR 212.5 (d)

Item 76.1:

Where a source owner can demonstrate to the satisfaction of the commissioner that he will apply best available control technology, the commissioner may specify a less restrictive permissible emission rate, emission standard or degree of air cleaning for such source than required under this Part provided that the less restrictive requirement is equivalent to that which can be achieved through the application of best available control technology

****** Emission Unit Level ******

Condition 77: Emissions from new emission sources and/or modifications
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 77.1:

This Condition applies to Emission Unit: U-00040 Emission Point: 01413

Item 77.2:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 78: Compliance Demonstration
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 78.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00040

Emission Point: 01413

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Regulated Contaminant(s):

CAS No: 000075-09-2	DICHLOROMETHANE
CAS No: 000079-20-9	ACETIC ACID, METHYL ESTER
CAS No: 000067-64-1	DIMETHYL KETONE

Item 78.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212.4(a) Best Available Control Technology (BACT) Table 2 requirements, the total emissions of dimethyl ketone (acetone), methyl acetate, and dichloromethane from Emission Point 01413, associated with the phospor dispersion making process, shall be limited to 0.25 tons per year (tpy) on a rolling twelve month basis. Additionally, emissions of dichloromethane (toxicity rating A) shall be limited to 145 lbs/yr on a rolling 12-month basis. These limits are based on the most recent BACT evaluation dated, May 2009, and information provided in the Notification of Change Under Title V Operational Flexibility Plan letter dated December 31, 2009.

Emissions shall be calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. Records shall be kept on site for five years and made available to the Department upon request.

The BACT demonstration shall be re-evaluated and submitted to the Department every five years. The next such evaluation shall be submitted by May 31, 2014.

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 79: Compliance Demonstration

Effective between the dates of 03/28/2012 and 03/27/2017

Applicable State Requirement: 6 NYCRR 212.4 (a)

Item 79.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00040

Emission Point: 01425

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Facility DEC ID: 8261400823



Regulated Contaminant(s):

CAS No: 000075-09-2 DICHLOROMETHANE
CAS No: 000067-64-1 DIMETHYL KETONE

Item 79.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212.4(a) Best Available Control Technology (BACT) Table 2 requirements, the total emissions of dimethyl ketone (acetone) and dichloromethane from Emission Point 01425, associated with the solvent cleaning tanks, shall be limited to 2.64 tons per year (tpy) on a rolling twelve month basis. This limit is based on the most recent BACT evaluation dated, May 2009. Additionally, emissions of dichloromethane are subject to the requirements of the Halogenated Solvent Cleaning MACT (40 CFR 63 Subpart T).

Emissions shall be calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. Records shall be kept on site for five years and made available to the Department upon request.

The BACT demonstration shall be re-evaluated and submitted to the Department every five years. The next such evaluation shall be submitted by May 31, 2014.

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 80: Emissions from new emission sources and/or modifications
Effective between the dates of 03/28/2012 and 03/27/2017**

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 80.1:

This Condition applies to Emission Unit: U-00040 Emission Point: 01425
Process: J05

Item 80.2:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 81: Emissions from new emission sources and/or modifications

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Effective between the dates of 03/28/2012 and 03/27/2017

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 81.1:

This Condition applies to Emission Unit: U-00040 Emission Point: 01426
Process: J02 Emission Source: 014AU

Item 81.2:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 82: Compliance Demonstration

Effective between the dates of 03/28/2012 and 03/27/2017

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 82.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00040 Emission Point: 01427

Regulated Contaminant(s):
CAS No: 000075-09-2 DICHLOROMETHANE

Item 82.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212.4(a) Best Available Control Technology (BACT) Table 2 requirements, emissions of dichloromethane from Emission Point 01427, associated with six solution preparation vessels, shall be limited to 150 lbs per year on a rolling twelve month basis. This limit is based on the most recent BACT evaluation dated, May 2009, and information provided in a Notification of Change Under Title V Operational Flexibility Plan letter dated December 31, 2009.

Emissions shall be calculated on a monthly basis using production records for the amount of processed material, emission factors for volume displacement, and product formulation calculations. The monthly emissions shall be incorporated into a twelve-month rolling total. Records shall be kept on site for five years and made available to the Department upon request.

The BACT demonstration shall be re-evaluated and submitted to the Department every five years. The next such



evaluation shall be submitted by May 31, 2014.

Monitoring Frequency: MONTHLY
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 83: Emissions from new emission sources and/or modifications
Effective between the dates of 03/28/2012 and 03/27/2017**

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 83.1:

This Condition applies to Emission Unit: U-00040 Emission Point: 01427
Process: J08

Item 83.2:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

**Condition 84: Emissions from new emission sources and/or modifications
Effective between the dates of 03/28/2012 and 03/27/2017**

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 84.1:

This Condition applies to Emission Unit: U-00040 Emission Point: 01428

Item 84.2:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

**Condition 85: Compliance Demonstration
Effective between the dates of 03/28/2012 and 03/27/2017**

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 85.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00040 Emission Point: 03101

Regulated Contaminant(s):
CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 85.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

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Facility DEC ID: 8261400823



In order to demonstrate compliance with 6 NYCRR Part 212.4(a) Best Available Control Technology (BACT) emission control requirements for emissions of hydrochloric acid from Emission Point 03101), Carestream must operate the Scrubber (Control Device 031AB) at all times the surface coating machines are operating within a pH range between 5.0 and 13.5. pH shall be monitored and recorded weekly. Records shall be maintained on site and made available to the Department upon request.

Parameter Monitored: PH

Lower Permit Limit: 5.0 pH (STANDARD) units

Upper Permit Limit: 13.5 pH (STANDARD) units

Monitoring Frequency: WEEKLY

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

Subsequent reports are due every 6 calendar month(s).

Condition 86: Compliance Demonstration
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 86.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00040

Emission Point: 03101

Regulated Contaminant(s):

CAS No: 007647-01-0

HYDROGEN CHLORIDE

Item 86.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212.4(a) Best Available Control Technology (BACT) emission control requirements for emissions of hydrochloric acid from Emission Point 03101), Carestream must operate the Scrubber (Control Device 031AB) at all times the surface coating machines are operating with a minimum flow rate of 37 gallons per minute. Scrubber flow rate shall be monitored and recorded weekly. Records shall be maintained on site and made available to the Department upon request.

Parameter Monitored: FLOW RATE

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Lower Permit Limit: 37 gallons per minute
Monitoring Frequency: WEEKLY
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 87: Compliance Demonstration
Effective between the dates of 03/28/2012 and 03/27/2017

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 87.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00040 Emission Point: 03101
Regulated Contaminant(s):
CAS No: 000064-17-5 ETHYL ALCOHOL (ETHANOL)
CAS No: 000067-64-1 DIMETHYL KETONE
CAS No: 000071-23-8 PROPANOL
CAS No: 000071-55-6 ETHANE, 1,1,1-TRICHLORO
CAS No: 000079-20-9 ACETIC ACID, METHYL ESTER
CAS No: 000108-88-3 TOLUENE
CAS No: 000109-99-9 TETRAHYDROFURAN
CAS No: 000110-82-7 CYCLOHEXANE
CAS No: 000141-78-6 ETHYL ACETATE
CAS No: 000075-09-2 DICHLOROMETHANE

Item 87.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to demonstrate compliance with 6 NYCRR Part 212.4(a) Best Available Control Technology (BACT) emission control requirements for emissions from the coating machine 99 (ES 014AD), Carestream must operate the Regenerative Thermal Oxidizer (RTO) (Control Device 031AA) and Scrubber (Control Device 031AB) at all times the surface coating machines are operating.

In accordance with Part 212.9 (Table 2), the minimum degree of air cleaning for applicable contaminants is as follows:

- dimethyl ketone (acetone): 75%
methyl acetate: 91%
dichloromethane: 99%
n-propanol: 75%

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tetrahydrofuran: 91%
1,1,1-trichloroethane: 75%
toluene: 75%
ethanol: 75%
ethyl acetate: 91%
cyclohexane: 75%

In order to maintain compliance with these air cleaning requirements, the temperature in the combustion zone must be continuously monitored and maintained at a minimum of 1621 degrees F (3-hour block average) at all times the surface coating machines are operating, as demonstrated during the December 8, 2008 performance test.

Records shall be maintained on site and made available to the Department upon request.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1621 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2012.
Subsequent reports are due every 6 calendar month(s).

**Condition 88: Emissions from new emission sources and/or modifications
Effective between the dates of 03/28/2012 and 03/27/2017**

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 88.1:

This Condition applies to Emission Unit: U-00069 Emission Point: 10491

Item 88.2:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

**Condition 89: Emissions from new emission sources and/or modifications
Effective between the dates of 03/28/2012 and 03/27/2017**

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 89.1:

This Condition applies to Emission Unit: U-00069 Emission Point: 11706

Item 89.2:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

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**Condition 90: Emissions from new emission sources and/or modifications
Effective between the dates of 03/28/2012 and 03/27/2017**

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 90.1:

This Condition applies to Emission Unit: U-00069 Emission Point: 117A0

Item 90.2:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

